



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

FEB 3 1993

MEMORANDUM

SUBJECT: Consideration of Unconditional Registration for the New Biochemical Cinnamonomum cassia (Cinnamon) for Indoor Use in Domestic Food Handling and Storage Areas and in Both Domestic and Commercial Non-Food Areas / EPA File Symbol 64714-R  
-DECISION MEMORANDUM-

FROM: Lawrence Culleen, Acting Director  
Registration Division

TO: Douglas D. Campt, Director  
Office of Pesticide Programs

ISSUE

Should the Agency grant unconditional registration to the subject product which contains the new active ingredient Cinnamonomum cassia under FIFRA section 3(c)(5)?

BACKGROUND

Regulatory History

- On 12/4/90, PM 18 informed Stanley Zitron of Memphis, TN that cinnamon had never been used as the active ingredient in an insect repellent.
- On 2/16/91 R.C.G., Inc. of Memphis, Tennessee submitted an application to register the new active ingredient Cinnamonomum cassia, i.e. cinnamon, for use indoors. Subsequent submissions of data prior to the initial review process being complete include 1) efficacy data submitted on 2/27/91, 6/18/92, 2/6/92, 2/9/92, and 7/15/92; and 2) product analysis data submitted on 2/25/92, 3/10/92, and 5/19/92.



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- On 4/3/91, the application passed the new chemical screen.
- On 7/11/91, C. cassia was classified as a biochemical pesticide.
- On 12/23/91, PM 18 sent a letter to R.C.G., Inc. informing the applicant that although reviews were still ongoing, two reviews had been completed and indicated efficacy and product chemistry deficiencies.
- On 2/21/92, PM 18 sent a letter to R.C.G., Inc. to inform the applicant of deficiencies in the technical manufacturing process and to indicate that other reviews were still ongoing.
- On 3/13/92, all toxicology data requirements were waived for the active ingredient. On 6/2/92, all toxicology data requirements were waived for the integrated end-use formulation.
- On 5/21/92, all nontarget organism data requirements were waived.
- On 7/16/92, an efficacy review indicated deficiencies.
- On 7/22/92 PM 18 sent a letter to R.C.G., Inc. regarding efficacy, labeling, and Confidential Statement of Formula deficiencies.
- 8/16, 9/22, and 10/27/92 submissions by R.C.G., Inc. satisfy deficiencies outlined in 7/22/92 letter.

#### USE SITES AND APPLICATION

Roach Repel is to be used indoors in domestic food handling and storage areas and in both domestic and commercial non-food areas to repel german cockroaches from the area of application. Roach Repel is to be applied at the rate of 4 grams/ square foot in the corners of the infested area.

#### TOXICOLOGY

No toxicology data have been submitted. However, the applicant and the manufacturer have assured the Agency that the technical material is of food-grade quality and used for human consumption. Therefore, all toxicology data requirements have been waived.